

Corbin T. Jones
Campaign Finance Analyst
Reports Analysis Division
ID#: C00406645
Reference: Mid-Year Report (1/1/07-6/30/07)

Dear Corbin:

The following is in reference to your letter dated September 5, 2007.

1. There were no payments for salary or wages on Schedule B supporting Line 30b because our employee did not spend more than 25% of her time on federal election activity or activities in connection with a federal election during the first half of this year, the time period covered by this report.
2. A review of this report reveals that an H1 was filed for this report period. Further review reveals complete disclosure for administrative expenses for this report period. The statement in Item #2 of your letter 'Each state, district or local party committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule HI' conflicts with 11 CFR 106.7(2). This paragraph states 'State, district, and local party committees may either pay administrative costs, including rent, utilities, office equipment, office supplies, postage for other than mass mailings, and routine building maintenance, upkeep and repair, from their Federal account, or allocate such expenses between their Federal and non-Federal accounts, except that any such expenses directly attributable to a clearly identified Federal candidate must be paid only from the Federal account.'

Our committee allocated administrative expenses on 1-25-07 for December 2006 and 2-1-07 for January 2007. We elected to pay administrative expenses during the remainder of this report period from our federal account.

Regards,
Paula Mackey
Treasurer
Tarrant County Republican Victory Fund
